

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

In re:	§	
	§	CHAPTER 11
ESCO MARINE, INC., et al¹	§	
	§	CASE NO. 15-20107
Debtors.	§	
	§	Joint Administration Pending

**CALLIDUS CAPITAL CORPORATION'S NOTICE OF NON-CONSENT
TO USE OF ITS CASH COLLATERAL**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Callidus Capital Corporation (“**Callidus**”) hereby gives notice that it does not consent to the use of its cash collateral by the Debtors on the terms set forth in the Debtors’ *Emergency Motion for Interim and Final Orders Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364 & 507 and Federal Rules of Bankruptcy Procedure 2002, 4001 & 9014 (I) Authorizing Use of Cash Collateral; (II) Granting Post-Petition Replacement Liens; (III) Granting Adequate Protection; and (IV) Scheduling a Final Hearing on the Motion* (the “**Cash Collateral Motion**”, Doc. #7).

Callidus intends to file an objection to the Cash Collateral Motion prior to the emergency hearing on the Cash Collateral Motion.

Dated: March 10, 2015.

Respectfully submitted,

**JORDAN, HYDEN, WOMBLE, CULBRETH &
HOLZER, P.C.**

/s/ Nathaniel Peter Holzer

Shelby A. Jordan
Texas Bar No. 11016700
Nathaniel Peter Holzer

¹ Other affiliated debtors are Esco Metals, LLC (Case No. 15-20108); Esco Shredding, LLC (Case No. 15-20109); Texas Best Recycling, LLC (Case No. 15-20110); Texas Best Equipment, LLC (Case No. 15-20111), (collectively, with Esco Marine, Inc., the “**Debtors**”)

Texas Bar No. 00793971
500 North Shoreline Blvd., Suite 900
Corpus Christi, TX 78401-0341
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
sjordan@jhwclaw.com
pholzer@jhwclaw.com

DICKINSON WRIGHT PLLC

Michael C. Hammer
Michigan Bar No. P41705
350 S. Main Street, Suite 300
Ann Arbor, MI 48104
Telephone: (734) 623-1696
Facsimile: (734) 623-1625
MHammer@dickinsonwright.com

Kristi A. Katsma
Michigan Bar No. P53545
500 Woodward, Suite 4000
Detroit, MI 48226
Telephone: (313) 223-3180
Facsimile: (313) 223-3598
KKatsma@dickinsonwright.com

**ATTORNEYS FOR CALLIDUS CAPITAL
CORPORATION**